

Fill in this information to identify the case

Debtor 1 Rahsaan G Thomas

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: EASTERN District of PENNSYLVANIA  
(State)

Case number 18-16902

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Wells Fargo Bank, N.A.

Court claim no. (if known):

Last 4 digits of any number you use to identify the debtor's account: 3663

Z

Property address: 37 West Wyneva Street

Number Street

Philadelphia PA 19144

City

State

Zip Code

Part 2: Prepetition Default Payments\*

Check one:

- ☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

N/A  
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow, and costs outstanding:

(b) \$ \_\_\_\_\_

c. Total. Add lines a and b.

(c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

/ /  
MM/DD/YYYY

Debtor 1 Rahsaan G Thomas Case number (if known) 18-16902  
First Name Middle Name Last Name

#### Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

#### Part 5: Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box.

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.**

**x** /s/Alyk L. Oflazian Date 01/11/2023  
Signature

Print: Alyk Lily Oflazian Title Attorneys for Creditor

Company Manley Deas Kochalski LLC

Address P.O. Box 165028  
Number Street

Columbus, OH 43216-5028  
City State ZIP Code

Contact phone 614-220-5611 Email amps@manleydeas.com

\* Consent Order relief granted and entered 10/02/2019 and it did not provide any language regarding the continued application of FRBP 3002.1 to this claim. As such, the notice requirements of FRBP 3002.1, including the Notice of Final Cure Payment, ceased to apply upon the effective date of that Order. Claimant requests that no order be entered or determination be made as to the Notice of Final Cure which would in any way deem the account current.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                               |   |                            |
|-------------------------------|---|----------------------------|
| <b>In re:</b>                 | : |                            |
|                               | : | <b>Case No.: 18-16902</b>  |
| <b>Rahsaan G Thomas</b>       | : | <b>Chapter 13</b>          |
|                               | : | <b>Judge Eric L. Frank</b> |
| <b>Debtor(s)</b>              | : | <b>*****</b>               |
|                               | : |                            |
| <b>Wells Fargo Bank, N.A.</b> | : | <b>Related Document #</b>  |
| <b>Movant,</b>                | : |                            |
| <b>vs</b>                     | : |                            |
|                               | : |                            |
| <b>Rahsaan G Thomas</b>       | : |                            |
| <b>Sade Thomas</b>            | : |                            |
|                               | : |                            |
| <b>Kenneth E. West</b>        | : |                            |
| <b>Respondents.</b>           |   |                            |

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Response to Notice of Final Cure was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

David M. Offen, Attorney for Rahsaan G Thomas, dmo160west@gmail.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Rahsaan G Thomas, 37 W. Wyneva Street, Philadelphia, PA 19144

Sade Thomas, 37 West Wyneva Street, Philadelphia, PA 19144

/s/Alyk L. Oflazian